

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

THOMAS ROGER WHITE, JR. and PATRICIA CAULEY on behalf of themselves and all others similarly situated,

Plaintiffs,

v.

SAMSUNG ELECTRONICS AMERICA, INC.
and SONY ELECTRONICS INC.,

Defendants.

Civil Action No. 17-1775 (MCA) (JAD)

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**STIPULATION AND CONSENT ORDER
EXTENDING DEFENDANTS' TIME TO
RESPOND TO PLAINTIFF'S
COMPLAINT AND EXTENDING THE
DISCOVERY STAY**

WHEREAS, this matter having come before the Court by way of joint consent application of the parties by Defendant Samsung Electronics America, Inc. (“Samsung”) through its attorneys, Gibbons P.C. and Covington & Burling LLP, Defendant Sony Electronics Inc. (“Sony”), by its attorneys, Holland & Knight, and Plaintiffs Thomas White and Patricia Cauley, by their attorney, Mack Press, Esq., pursuant to Local Civil Rule 6.1(a), extending the time within which Defendants must answer, move, or otherwise respond to Plaintiff's Complaint (the “Complaint”), and extending the discovery stay previously entered in this matter;

WHEREAS, on October 16, 2019, Steven C. Mannion, United States Magistrate Judge, entered an Order amending the briefing schedule on Defendants' motions for reconsideration or to certify for immediate interlocutory appeal pursuant to 28 U.S.C. §1292(b), ECF No. 112, which are now fully briefed, with Reply briefs having been filed on November 4, 2019 (Samsung), ECF No. 115, and November 12, 2019 (Sony), ECF No. 120;

WHEREAS, the Court's October 16, 2019 Order also extended the time within which Defendants must answer or otherwise respond to the Second Amended Complaint up to December 5, 2019, absent further court order, and also Ordered that the discovery stay entered on April 30, 2018, ECF No. 72, shall remain in effect until December 5, 2019. ECF No. 112;

WHEREAS, the parties, by consent, now seek to extend (i) the previously entered discovery stay order and (ii) the time within which Defendants must answer or otherwise respond to the Second Amended Complaint (1) for a period of 90 days up to and including March 5, 2020; or (2) if the Court issues its decision on the pending motions for reconsideration or certification for interlocutory appeal, ECF Nos. 105, 106, before March 5, 2020, for a period of 30 days after the Court issues its decision; and good cause having been shown:

IT IS on this ____ day of _____, 2019;

ORDERED that the discovery stay order and the time within which Defendants must answer or otherwise respond the Second Amended Complaint shall both be extended (1) for a period of 90 days up to and including March 5, 2020; or (2) if the Court issues its decision on the pending motions for reconsideration or certification for interlocutory appeal before March 5, 2020, for a period of 30 days after the Court issues its decision.

Stipulated and agreed by all Counsel:

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**SONY ELECTRONICS
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IT IS SO ORDERED.

Dated: _____

Magistrate Judge Joseph A. Dickson
United States Magistrate Judge